

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON INC  
PELVIC REPAIR SYSTEMS  
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

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THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBIT:

**JOINT MOTION TO DISMISS WITHOUT PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibit A and defendant American Medical Systems, Inc., (“AMS”) jointly move the court to dismiss these actions without prejudice and terminate them from the docket of the court, parties to bear their own costs. Other defendants remain in this action, and plaintiffs will continue to pursue this action against them.

Respectfully:

/s/ Barbara Binis

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*Attorney for Plaintiffs on Exhibit A*

Dated: March 13, 2019

**EXHIBIT A – CELLINO & BARNES**

| <b>CIVIL ACTION<br/>NUMBER</b> (listed<br>numerically in<br>ascending order) | <b>CASE NAME</b>   |
|--|--|
| 2:12-cv-03959  | Mary Jane McLaughlin v. Ethicon, Inc., Johnson & Johnson, Boston Scientific Corporation, American Medical Systems, Inc.  |
| 2:13-cv-00512  | William Gerald Wahl, Administrator of the Estate of Cathy S. Wahl, deceased, William G. Wahl v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc. |

**CERTIFICATE OF SERVICE**

I hereby certify that on March 13, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis